

**BEFORE THE
STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

BUG STOP SERVICES, INC.
1007 E. Dominguez Street, Ste. N
Carson, CA 90746
CESAR RAYMUNDO LARA, QM, PR
SOLEDAD LARA, VP
JOHN B. GRIFFIN, Secretary
Company Reg. Certificate No. PR 5687, Br. 2

CESAR RAYMUNDO LARA
5059 Montair Avenue
Lakewood, CA 90712
Field Representative License No. FR 38391
Operator License No. OPR 11879, Br. 2

Respondents.

Case No. 2012-6

OAH No. 2013070556

In the Matter of the Statement of Issues Against:

BUG STOP SERVICES, INC.
5059 Montair Avenue
Lakewood, CA 90712
CESAR RAYMUNDO LARA, PRESIDENT
AND QUALIFYING MANGER
Applicant for Company Registration Upgrade,
Branch 3

Respondent.

Case No. 2012-24

OAH No. 2013070558

In the Matter of the Statement of Issues Against:

Case No. 2012-25

OAH No. 2013070559

CESAR RAYMUNDO LARA

5059 Montair Avenue

Lakewood, CA 90712

**Applicant for Operator's License Upgrade,
Branch 3**

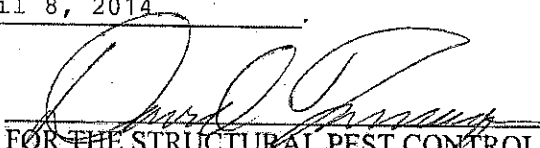
Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Structural Pest Control Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on May 8, 2014.

It is so ORDERED April 8, 2014.



FOR THE STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF CONSUMER AFFAIRS

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2 ARMANDO ZAMBRANO
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8
9 BEFORE THE
STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 2012-6

12 **BUG STOP SERVICES, INC.**
1007 E. Dominguez Street, Ste. N
13 Carson, CA 90746

OAH No. 2013070556

14 **CESAR RAYMUNDO LARA, QM, PR**
SOLEDAD LARA, VP
15 **JOHN B. GRIFFIN, Secretary**
Company Reg. Certificate No. PR 5687, Br. 2
16

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

17 **CESAR RAYMUNDO LARA**
5059 Montair Avenue
18 Lakewood, CA 90712
Field Representative License No. FR 38391
19 Operator License No. OPR 11879, Br. 2

20 Respondents.

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22 In the Matter of the Statement of Issues Against:

Case No. 2012-24

23 **BUG STOP SERVICES, INC.**
5059 Montair Avenue
Lakewood, CA 90712
24 **CESAR RAYMUNDO LARA, PRESIDENT**
AND QUALIFYING MANGER
25 Applicant for Company Registration Upgrade,
Branch 3
26

OAH No. 2013070558

27 Respondent.
28

1 In the Matter of the Statement of Issues Against:

Case No. 2012-25

2 **CESAR RAYMUNDO LARA**

OAH No. 2013070559

3 5059 Montair Avenue

4 Lakewood, CA 90712

5 **Applicant for Operator's License Upgrade,
Branch 3**

Respondent.

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7 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
8 entitled proceedings that the following matters are true:

9 **PARTIES**

10 1. William H. Douglas (Complainant) was the former Interim Registrar/Executive
11 Officer of the Structural Pest Control Board. He brought these actions solely in his official
12 capacity. Susan Saylor is the current Registrar/Executive Officer of the Structural Pest Control
13 Board. She maintains these action solely in her official capacity and is represented in this matter
14 by Kamala D. Harris, Attorney General of the State of California, by Alvaro Mejia, Deputy
15 Attorney General.

16 2. Bug Stop Services, Inc. and Cesar Raymundo Lara (collectively "Respondents") are
17 representing themselves in these proceedings and have chosen not to exercise their right to be
18 represented by counsel.

19 **Bug Stop Services, Inc. - Company Registration Certificate No. PR 5687**

20 3. On or about October 2, 2008, the Board issued Company Registration Certificate
21 Number PR 5687 ("registration") in Branch 2 to Bug Stop Services, Inc. ("Respondent Bug
22 Stop"), with Michael Rodriguez as the President and Sinclair Jones as the Qualifying Manager.
23 Sinclair Jones passed away. On or about February 9, 2009, the registration was suspended for
24 failing to have a Qualifying Manager. On or about July 8, 2009, Cesar Raymundo Lara
25 ("Respondent Lara") became the Qualifying Manager. On or about August 30, 2010, Respondent
26 Lara became the President, John Griffin became the Secretary, and Soledad Lara became the Vice
27 President. The license was in full force and effect at all times relevant to the charges brought
28 herein. On or about September 15, 2010, the Board received an Application for Registration of

1 Company to upgrade Bug Stop Services, Inc. to include Branch 3 from Respondent Cesar
2 Raymundo Lara. The Board denied the application on January 25, 2011.

3 **Cesar Raymundo Lara**

4 **Operator's License No. 11879**

5 4. On or about July 2, 2009, the Board issued Operator's License Number OPR 11879 in
6 Branch 2 to Respondent Lara as an employee of Rapid Pest Solutions, Inc. On or about July 6,
7 2009, Respondent Lara left the employ of Rapid Pest Solutions, Inc. On or about July 8, 2009,
8 Respondent Lara became the Qualifying Manager of Bug Stop Services, Inc. On or about
9 September 16, 2009, Respondent Lara became the Qualifying Manager for Pro Central Termite
10 Control in Branch 2. On or about August 30, 2010, Respondent Lara became the President of
11 Bug Stop Services, Inc. Operator's License No. OPR 11879 was in full force and effect at all
12 times relevant to the charges brought herein and will expire on June 30, 2015, unless renewed.
13 On or about November 18, 2010, the Board received an Application for Operator's License to
14 upgrade Operator's License No. OPR 11879 to include Branch 3 from Cesar Raymundo Lara.
15 The Board denied the application on January 31, 2011.

16 **Field Representative's License No. FR 38391**

17 5. On or about March 29, 2005, the Board issued Field Representative's License
18 Number FR 38391 in Branch 2 to Respondent Lara as an employee of Dewey Pest Control. On
19 or about June 10, 2008, the license was upgraded to include Branch 3. On or about February 18,
20 2009, the license was upgraded to include Branch 1, and Respondent Lara became employed with
21 Master Fume, Inc. On or about March 5, 2009, Respondent Lara became employed with Rapid
22 Pest Solutions, Inc. Field Representative License No. FR 38391 was in full force and effect at all
23 times relevant to the charges brought herein and will expire on June 30, 2016, unless renewed.

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1 **JURISDICTION**

2 6. Accusation No. 2012-6 and Statement of Issues Nos. 2012-24 and 2012-25 were filed
3 before the Structural Pest Control Board (Board) Department of Consumer Affairs, and are
4 currently pending against Respondents. The Accusation and Statement of Issues and all other
5 statutorily required documents were properly served on Respondent on August 3, 2012.
6 Respondents timely filed their Notice of Defense contesting the Accusation and Statement of
7 Issues.

8 7. A copy of Accusation No. 2012-6 and Statement of Issues Nos. 2012-24 and 2012-25
9 is attached as exhibit A and incorporated herein by reference.

10 **ADVISEMENT AND WAIVERS**

11 8. Respondents have carefully read, and understands the charges and allegations in
12 Accusation No. 2012-6 and Statement of Issues Nos. 2012-24 and 2012-25. Respondents have
13 also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary
14 Order.

15 9. Respondents are fully aware of their legal rights in this matter, including the right to a
16 hearing on the charges and allegations in the Accusation and Statement of Issues; the right to be
17 represented by counsel at their own expense; the right to confront and cross-examine the
18 witnesses against them; the right to present evidence and to testify on their own behalf; the right
19 to the issuance of subpoenas to compel the attendance of witnesses and the production of
20 documents; the right to reconsideration and court review of an adverse decision; and all other
21 rights accorded by the California Administrative Procedure Act and other applicable laws.

22 10. Respondents voluntarily, knowingly, and intelligently waives and gives up each and
23 every right set forth above.

24 **CULPABILITY**

25 11. Respondents admits the truth of each and every charge and allegation in Accusation
26 No. 2012-6 and Statement of Issues Nos. 2012-24 and 2012-25.

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1 12. Respondents agree that the Company Registration Certificate, Operator's License,
2 and Field Representative License are subject to discipline agree to be bound by the Board's
3 probationary terms as set forth in the Disciplinary Order below. Respondents further agree that
4 its application for Company Registration Upgrade, Branch 3 and Respondent Lara's application
5 for Operator's License Upgrade, Branch 3, are subject to denial, and agree to be bound by the
6 Board's probationary terms as set forth in the Disciplinary Order below.

7 CONTINGENCY

8 13. This stipulation shall be subject to approval by the Structural Pest Control Board.
9 Respondents understand and agree that counsel for Complainant and the staff of the Structural
10 Pest Control Board may communicate directly with the Board regarding this stipulation and
11 settlement, without notice to or participation by Respondents. By signing the stipulation,
12 Respondents understand and agree that they may not withdraw their agreement or seek to rescind
13 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
14 this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall
15 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
16 between the parties, and the Board shall not be disqualified from further action by having
17 considered this matter.

18 14. The parties understand and agree that electronic or facsimile copies of this Stipulated
19 Settlement and Disciplinary Order, including electronic or facsimile signatures thereto, shall have
20 the same force and effect as the originals.

21 15. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
22 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
23 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
24 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
25 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
26 writing executed by an authorized representative of each of the parties.

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16. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Company Registration Certificate No. PR 5687 issued to Respondent Bug Stop Services, Inc., Operator's License No. OPR 11879 issued to Respondent Lara, and Field Representative License No. FR 38391 issued to Respondent Lara are revoked. However, the revocations are stayed and Respondents are placed on probation for three (3) years on the following terms and conditions.

IT IS FURTHER ORDERED that Respondent Bug Stop Services, Inc.'s application for Company Registration Upgrade, Branch 3, is granted, and the registration shall be immediately revoked. However, the revocation is stayed for three (3) years on the following terms and conditions.

IT IS FURTHER ORDERED that Respondent Lara's application for Operator's License Upgrade, Branch 3, is granted, and the license shall be immediately revoked. However, the revocation is stayed for three (3) years on the following terms and conditions.

1. **Obey All Laws.** Respondents shall obey all federal, state and local laws, and all laws and rules relating to the practice of structural pest control.

2. **Quarterly Reports.** Respondents shall file quarterly reports with the Board during the period of probation.

3. **Tolling of Probation.** Should Respondents leave California to reside outside this state, Respondents must notify the Board in writing of the dates of departure and return. Periods of residency or practice outside the state shall not apply to reduction of the probationary period.

4. **Notice to Employers.** Respondents shall notify all present and prospective employers of the decision in case nos. 2012-6; 2012-24, and 2012-25 and the terms, conditions and restrictions imposed on Respondents by said decision.

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1 Within 30 days of the effective date of this decision, and within 15 days of Respondents
2 undertaking new employment, Respondents shall cause his/her employer to report to the Board in
3 writing acknowledging the employer has read the decision in case nos. 2012-6; 2012-24, and
4 2012-25

5 5. **Notice to Employees.** Respondents shall, upon or before the effective date of this
6 decision, post or circulate a notice to all employees involved in structural pest control operations
7 which accurately recite the terms and conditions of probation. Respondents shall be responsible
8 for said notice being immediately available to said employees. "Employees" as used in this
9 provision includes all full-time, part-time, temporary and relief employees and independent
10 contractors employed or hired at any time during probation.

11 6. **Completion of Probation.** Upon successful completion of probation, Respondents'
12 licenses will be fully restored.

13 7. **Violation of Probation.** Should Respondents violate probation in any respect, the
14 Board, after giving Respondents notice and an opportunity to be heard, may revoke probation and
15 carry out the disciplinary order which was stayed. If a petition to revoke probation is filed against
16 Respondents during probation, the Board shall have continuing jurisdiction until the matter is
17 final, and the period of probation shall be extended until the matter is final.

18 8. **Random Inspections.** Respondents shall reimburse the Board for one (1) random
19 inspection per quarter by Board specialists during the period of probation not to exceed \$125 per
20 inspection.

21 9. **Prohibited from Serving as Officer, Director, Associate, Partner or Qualifying**
22 **Manager.** Respondent Cesar Raymundo Lara is prohibited from serving as an officer, director,
23 associate, partner, qualifying manager or branch office manager of any registered company other
24 than Bug Stop Services, Inc. during the period that discipline is imposed on Company
25 Registration Certificate No. PR 5687, Operator License No. 11879, and Field Representative
26 License No. FR 38391.

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1 10. **No Interest In Any Registered Company.** Respondent Cesar Raymundo Lara shall
2 not have any legal or beneficial interest in any company registered by the Board other than Bug
3 Stop Services, Inc. during the period that discipline is imposed.

4 11. **Cost Recovery.** Pursuant to Section 125.3 of the California Business and Professions
5 Code, Respondents shall pay to the Board investigation and enforcement costs in the amount of
6 \$3,000.00 according to a payment schedule that has been approved by the Board, with payments
7 to be completed no later than six (6) months prior to the end of the probation term. Failure to
8 make a timely payment according to the payment schedule, and/or failure to complete payment of
9 cost recovery, shall constitute a violation of probation, which may subject Respondents' licenses
10 to outright revocation. Probation shall not be terminated until all costs are paid in full.

11 **ACCEPTANCE**


12 I have carefully read the above Stipulated Settlement and Disciplinary Order. I understand
13 the stipulation and the effect it will have on my Company Registration Certificate. I enter into
14 this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and
15 agree to be bound by the Decision and Order of the Structural Pest Control Board.

16
17 DATED: 11/26/2013


18 BUG STOP SERVICES, INC.,
19 CESAR RAYMUNDO LARA, PRESIDENT
Respondent

20 I have carefully read the above Stipulated Settlement and Disciplinary Order. I understand
21 the stipulation and the effect it will have on my Operator and Field Representative Licenses. I
22 enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and
23 intelligently, and agree to be bound by the Decision and Order of the Structural Pest Control
24 Board.

25
26 DATED: 11/26/2013


27 CESAR RAYMUNDO LARA
28 Respondent

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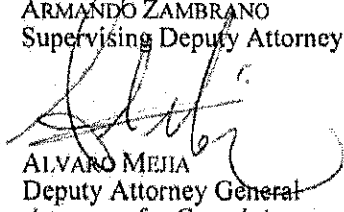
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Structural Pest Control Board of the Department of Consumer Affairs.

Dated: 12-03-2013

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
ARMANDO ZAMBRANO
Supervising Deputy Attorney General


ALVARO MEJIA
Deputy Attorney General
Attorneys for Complainant

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